

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

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Keliy Phillips # 147975 / Anthony Richards  
 Full name and prison number of plaintiff(s)  
 v.  
Pike County Jail Administration  
Jail Administrator - Mrs. Olivia  
Sheriff Last Name UNKNOWN  
Russell Thomas / Capt. Doug Wheeler  
Pike County Sheriff Dept.  
 Name of person(s) who violated your constitutional rights.  
 (List the names of all the persons)

2:06cv239-MEF

CIVIL ACTION NO. 2:06cv239-MEF  
 (To be supplied by the Clerk of the U.S. District Court)

## I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? Yes ( ) No

B. Have you begun other lawsuits in state or federal court relating to your imprisonment? Yes ( ) No

C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

## 1. Parties to this previous lawsuit:

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

## 2. Court (if federal court, name the district; if state court, name the county)

\_\_\_\_\_

## 3. Docket No. \_\_\_\_\_

## 4. Name of Judge to whom case was assigned \_\_\_\_\_

SCANNED

CJ 30604

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

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6. Approximate date of filing lawsuit \_\_\_\_\_

7. Approximate date of disposition \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT Pike County Jail, Troy AL 36081

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Pike County Jail  
Troy AL 36081

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME	LAST NAME UNKNOWN	ADDRESS
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120 W. Church St.

1. Mrs. Olivia - Pike Co. Jail Administrator / Pike Co. Jail, Troy AL, 36081
2. Pike County Jail Administrative Procedures / 120 W Church St., Troy AL, 36081
3. Deputy / Captain Doug [REDACTED] Wheeler / 120 W Church St., Troy AL, 36081
4. Sheriff Russell Thomas / 120 W. Church St., Troy AL, 36081

5. \_\_\_\_\_

6. \_\_\_\_\_

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED (REDACTED)  
2-17-06 / thru / 02-22-06

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

- ① GROUND ONE: Medical Negligence / Refusal of Medical Treatment.
- ② Unhealthy living conditions for all inmates.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place, manner, and person involved).

K.P. (Handwritten note: K.P.)

Upon Detainment on 2-15-06 I stated a medical condition in which was documented by jailer, and on 2-22-06 I sent a request to Mrs. Olivia stating problem had inflamed and bleeding was occurring because I am a state inmate, and until Kelly can relieve me, Mrs. Olivia refuses to send me to a local physician, or Doctor, and has denied the request to do so on 2-23-06 / 2-24-06 / 2-26-06 / 2-27-06 / and numerous phone calls have been made from Family Affiliate Partition (334)-774-2819) and mother Dore Phillips (334)-893-3123 where she stated (Mrs. Olivia), I, Kelly Phillips, have been checked out by physician and was fine. No records to prove her statement or that any attempt has been made to stop the bleeding. As of 3-1-06 I am still internally bleeding, vomiting blood, and in my stool. 7 days is dangerous and potentially fatal over.

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Pike County Jail Does NO CSC Document 1 Filed 03/15/2006 Page 3 of 4  
to determine if inmates are housed safely or  
to separate potentially harmful inmates or unhealthy  
inmates with contagious sicknesses such as H.I.V.  
Tuberculosis, or other potentially health hazard diseases.

There are no stainless steel toilets or sinks in the  
Facility to declare minimization of some health issues.

GROUND TWO: UNSAFE, AND DANGEROUS LIVING ENVIRONMENTS /  
AND, DENIAL OF EXERCISE PRIVILEGES! NO INMATES ARE ALLOWED OUTSIDE!!

SUPPORTING FACTS: PIKE County Jail is a small institution. The upper parts are used for detaining inmates. JAIL OFFICIALS MAKE NO routine checks of inmates, NO Headcounts, and the lack of cameras to observe inmates makes the environment hostile ~~area~~ in a negligent kind of way.

~~PIKE County can produce no records to show routine checks or headcounts are made by rotating Shifts.~~

GROUND THREE: DENIAL OF USE, OR ACCESS TO LAW LIBRARY  
AND COURTHOUSE LAW LIBRARY.

SUPPORTING FACTS: ON several attempts both Kelly Phillips and Anthony Richards have been denied ACCESS to LAW LIBRARY  
I on 2-17-06 - 2-19-06 - 2-20-06 - 2-22-06  
For every request Availability was not made.  
Richards also denied on 4 attempts, in Dec 04-05

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Investigate, Grant relief by changing conditions of housing  
and procedures in Pike Co. Jail Troy Al.

Review Decision by Pike Co. Officials to Allow Mrs. Olivia to continue as Administrator.

Award monetary damages.

Kelly Phillips  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on March 1, 2006. 12:36  
(date) # 147985

Kelly Phillips / Anthony Richards, Jr.  
Signature of plaintiff(s)